



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL
AND PUBLIC AFFAIRS

December 8, 2014

Frank Lockart
Groundfish and Coastal Pelagic Species Program Director
NMFS West Coast Region
National Oceanic and Atmospheric Administration
7600 Sand Point Way NE
Seattle, Washington 98115

Re: EPA Comments on the Draft Environmental Impact Statement for the proposed 2015-2016 Pacific Groundfish Harvest Specifications and Management Measures, Amendment 24, EPA Project #10-041-NOA.

Dear Mr. Lockart:

We have reviewed the above-referenced document in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we assign a rating to the Draft Environmental Impact Statement (EIS) based on the environmental impacts of the proposed action and the document's adequacy in meeting NEPA requirements.

The Draft EIS evaluates the potential impacts associated with proposed fishery specification for all Pacific Groundfish fisheries, including those fisheries that have been determined to be overfished. This amendment establishes default rules for harvest control and assesses the impacts of implementing these rules over the biennial management period. The management measures would supersede existing management and harvest regulation and result in the amendment of the current Pacific Coast Groundfish Fishery Management Plan.

While the document is profuse with highly technical and scientific information, we find it well-organized, and the tables and graphs are useful to the reader. The Executive Summary and Section 1.1 are particularly helpful in the process of navigating the analysis of the numerous options within each alternative. We commend the National Marine Fisheries Service for providing detailed explanation regarding the development of each alternative and understanding the rationale behind the development of each alternative. We also appreciate that the proposals continue to incorporate a long-term monitoring program that allows for changes in management decisions during the planning period and will be used to inform the future management decisions. Finally, we support the consideration of implications of climate change on the Groundfish fisheries in the document.

We have rated the Draft EIS "LO" (Lack of Objections) due to the protective approach of each preferred alternative identified for the management specifications, the stock complex reorganization and designation of ecosystem component species, and the default harvest control rules. We also support the proposed management measures which are primarily intended to improve fishery monitoring while

controlling Groundfish catch. A copy of EPA's rating system criteria used in conducting our environmental review is enclosed. Our rating and our comments will be posted on the EPA Office of Federal Activities website at <http://www.epa.gov/compliance/nepa/eisdata.html>.

Thank you for the opportunity to review and provide written comments on this Draft EIS. If you have any questions regarding this letter, please contact Jennifer Curtis of my staff at (907) 271-6324 or by e-mail at curtis.jennifer@epa.gov.

Sincerely,

A handwritten signature in black ink, reading "Christine B. Reichgott". The signature is fluid and cursive, with the first name "Christine" being more prominent and the last name "Reichgott" following in a similar style.

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure:

1. U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action*

ENCLOSURE 1
U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action*

Environmental Impact of the Action

LO - Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment.
February, 1987.